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August 4, 2020

District Judge Rachel P. Kovner
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11021

Re: 1:19-cv-06448-RPK-CLP
Warren v. Whole Foods Market Group, Inc.

Dear District Judge Kovner:

This office with Reese LLP, Michael Reese, represents the plaintiff. Plaintiff submits this request for an extension of time to file an amended complaint (“FAC”).

Plaintiff submits this request for extension because the parties continue to confer in good faith regarding potential settlement and pre-planned scheduling caused the parties to be out of communication for several days. The FAC was originally scheduled to be due Tuesday, August 4, 2020. Plaintiff requests 14 days to file the FAC. If granted the request for extension, plaintiff shall file the FAC on or before Tuesday, August 18, 2020. Defendant informed this office it does not oppose the present request.

There has been one prior request for extension of this date, which was granted by this Court on Wednesday, June 10, 2020. No other scheduled dates would be affected through this request for extension of time. Plaintiff regrets that this request is not made two business days prior to the filing date for the FAC. Plaintiff apologizes for this oversight. Thank you.

Respectfully submitted,

/s/Christopher Patalano
Christopher Patalano

Certificate of Service

I certify that on August 4, 2020, I served and/or transmitted the foregoing by the method below to the persons or entities indicated, at their last known address of record (blank where not applicable).

	CM/ECF	First-Class Mail	Email	Fax
Defendant's Counsel	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Plaintiff's Counsel	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Courtesy Copy to Court	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

/s/ Christopher Patalano